EXHIBIT B

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICTOF DELAWARE

Jack W. Wolf Plaintiff v. C/O Pusey, C/O Carter and Lt. Seacord Defendants	))))))))	C. A. No. 04-1385-GMS

AFFIDAVIT OF RAMON CARTER

I, Correctional Corporal Ramon Carter, having been duly sworn according to the law, do hereby depose and state as follows:

1. I am employed by the State of Delaware, Department of Correction ("DOC") at the Delaware Correctional Center ("DCC") Smyrna, Delaware as a Correctional Corporal. I commenced employment on September 20, 2001. I am currently assigned to work the Security Housing Unit SHU Building 19. In July 28, 2004, I was assigned to building 21 in the MHU.

2. I make this affidavit based upon my personal knowledge.

3. I have read Jack Wolf's complaint, and I dispute his allegations.

4. I recall, on July 28, 2004, I responded to a call for assistance. I arrived at the observation room building 22.

5. Inmate Jack Wolf was handcuffed behind his back, yelling and shouting profanities at the officers. I recall that at one point, he charged at the Lieutenant. Immediately I and another officer grabbed inmate Wolf by his arms and sat him back down to prevent him from using his body, e.g., head, feet, or weight to strike the Lieutenant.

6. Wolf was taken from the observation room. I recall him complaining that he could not walk. Inmate Wolf stated that he could not stand, so he was placed on a laundry cart to wait for the nurse to arrive to examine him.

5. I recall that Inmate Wolf was seen by the nurse, but she did not order that he stay in the infirmary. After his examination was completed, he stated that he was going to "sue all you mother f—kers" as he looked at our identification badges. He was dissatisfied because the nurse did not tell him what he wanted to hear. He acted in an angry and hostile manner and repeatedly cursed the officers.

6. At no time did I observe any officer attack and beat Wolf. Nor did I witness him being slammed on a cart, or being mishandled by any staff while waiting for the nurse.

7. The only force used against inmate Wolf was necessary to gain control of him and to maintain the safety and security of staff.

Ramon Carter

SWORN TO AND SUBSCRIBED before me this 20 day of November, 2007.

Notary